

BELLSOUTH  
TELECOMMUNICATIONS, INC.  
FLORIDA

## GENERAL SUBSCRIBER SERVICE TARIFF

Sixth Revised Page 11  
Cancels Fifth Revised Page 11

ISSUED: August 27, 2001

EFFECTIVE: September 11, 2001

BY: Joseph P. Lacher, President -FL  
Miami, Florida

**A7. COIN TELEPHONE SERVICE****A7.4 Access Line Service For Payphone Service Provider Telephones (Cont'd)****A7.4.5 Rates and Charges (Cont'd)****A. Access Line Service for PSP - Rates and Charges Applied by The Company (Cont'd)**

7. The Access Line Service PSP subscriber who subscribes to Flat Rate Service as described in A7.4.5.A.2 will be charged for sent paid calls to the Local Calling Plus exchanges outlined in A3.8.50 at the rates set forth in A7.4.5.A.2 of this Tariff.
8. Non-sent paid IntraLATA calls will be rated to the end user at the rate set forth in A18.3.1.H plus the appropriate additive operator services charges as provided in A18.3.1.H of this Tariff, plus the set fee as provided in A7.6 of this Tariff.
9. Rates as described in A3.9.2 and A18.7.2 are applicable to all Directory Assistance calls.
10. Service Charges as covered in Section A4 of this Tariff for business individual line service are applicable.
11. Listings in connection with Access Line Service for PSP are furnished under the same rates and regulations as other business service.
12. Suspension of service, as covered in A2.3, is not available to Access Line Service for PSP unless the instrument is totally inaccessible to the general public on a temporary basis. In all cases, the decision to permit temporary suspension of service for Access Line Service for PSP rests with the Company.
13. When service is temporarily suspended at the subscriber's request, a Secondary Service Ordering Charge and a restoration charge, as covered in A4.3, per telephone number restored, is applied.

**B. Access Line Service for PSP - Rates and Charges Applied by The Subscriber**

1. Rates charged any end user by a PSP, providing operator service within the pay telephone premises' equipment, shall not exceed the following:
  - a. Local coin calls - the rate posted at the pay telephone station.
  - b. Extended area service (EAS) coin calls - a rate equivalent to the local coin call rate.
  - c. Extended calling scope (ECS) calls the rate equivalent to the local coin rate
  - d. 0+ toll non-person-to-person - a maximum rate of \$0.30 per minute, plus a \$1.75 charge.
  - e. 0+ toll person-to-person - a maximum rate of \$0.30 per minute, plus a \$3.25 charge.
  - f. 0+ non-person-to-person local - a rate equivalent to the local coin rate, plus a \$1.75 charge.
  - g. 0+ per-to-person local - a rate equivalent to the local coin rate, plus a \$3.25 charge.
2. A PSP shall not obtain services from an interexchange carrier or an operator service provider unless such carrier or provider has obtained a certificate of public convenience and necessity from the Commission.

**C. BellSouth® PSP Reward® Plan**

1. Definition and Requirements
  - a. The BellSouth® PSP Reward® Plan provides the PSP a discount, ranging from 0 to 8.50 percent, for a term commitment of 12 or 24 months to be applied monthly, one month in arrears, to the subscribing PSPs recurring monthly access line charge. (C)
  - b. The BellSouth® PSP Reward® Plan term discount will become effective when an authorized agent of the Company executes a Letter of Intent for the BellSouth® PSP Reward® Plan but not prior to the approval of this Tariff.
  - c. The BellSouth® PSP Reward® Plan offers a discount on the access line rates in A.2.a. preceding. The discount applied will be based on the number of PSP access lines subscribed to the BellSouth® PSP Reward® Plan and the term commitment agreed upon.
  - d. The PSP must subscribe all its payphone lines to the Company's Public Telephone Access Service.
    - (1) The BellSouth® PSP Reward® Plan does not apply to the BellSouth SmartLine® service.
    - (2) BellSouth SmartLine® service access lines do not apply toward the line count used to determine the discount level.
    - (3) This plan does not apply to Inmate lines.

AT&T COMMUNICATIONS OF THE SOUTHERN STATES, INC.  
GENERAL SERVICES TARIFF  
FLORIDA

ISSUED: February 25, 1999  
BY: Gary Graham, Tariff Administrator

EFFECTIVE: February 26, 1999  
THIRTEENTH REVISED PAGE 8  
CANCELS TWELFTH REVISED PAGE 8

All. MESSAGE TELECOMMUNICATIONS SERVICE

All.3 Two-Point Service (Cont'd)

All.3.1 Service Between Telephones (Cont'd)

I. Rate Tables (Cont'd)

7. Additional Charges

- a. The following charges are in addition to the usage charges for interLATA calls found in the preceding Rate Tables as indicated.

Class of Service	Billed To					
	AT&T CIID/891 Card		Local Exchange Co. Calling Card		Commercial Credit/ Charge Card	
<u>For Card calls accessing AT&amp;T's network other than via 1-800-CALLATT:</u>						
- Customer Dialed Calling Card Station	\$0.99	I	\$1.75	I	\$1.75	I
Customer Dialed/Automated						
Customer Dialed and	\$1.75	R	\$1.75	R	\$1.75	R
Operator Assisted						
Customer Dialed-Operator	\$0.99	I	\$1.75	I	\$1.75	I
Must Assist						
- Operator Dialed Calling Card Station	\$1.75	R	\$1.75	R	\$1.75	R
<u>For Card calls accessing AT&amp;T's network via 1-800-CALLATT:</u>						
- Customer Dialed Calling Card Station	\$0.99	I	\$1.75	I	\$1.75	I
Customer Dialed/Automated						
Customer Dialed and	\$1.75	R	\$1.75	R	\$1.75	R
Operator Assisted						
Customer Dialed-Operator	\$0.99	I	\$1.75	I	\$1.75	I
Must Assist						
- Operator Dialed Calling Card Station	\$1.75	R	\$1.75	R	\$1.75	R

Class of Service	Billed To			
	AT&T CIID/891 Card		All Other Calls	
- Person-to-Person*	\$3.25	R	\$3.25	R
- Operator Station*			Automated Calls	Operator Assisted Calls
Collect	-		\$1.75 R	\$1.75 R
Billed to Third Number	-		\$1.75 R	\$1.75 R
Sent Paid-Non Coin	-		\$1.75 R	\$1.75 R
Sent Paid-Coin	-		\$1.75 R	\$1.75 R

Inmate Rate Caps  
Kentucky

**State:** Kentucky

**Local:** Service charge: \$1.50  
Local message charge: \$0.35 per call

**IntraLata:** \$ 0.23 per minute

**InterLata:** \$ 0.28 per minute

Call originating from correctional facilities cannot collect Set Use Fees

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, LLC  
GENERAL SERVICES TARIFF  
KENTUCKY

TARIFF A  
SECTION A5

ISSUED: November 27, 2001

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BY: Leslie Buford-Tariff Administrator

FOURTH REVISED PAGE 4.7

CANCELS THIRD REVISED PAGE 4.7

A5. MESSAGE TELECOMMUNICATIONS SERVICE

A5.3 Two Point Service (Cont'd)

A5.3.1 Service Between Telephones (Cont'd)

B. Rates and Charges (Cont'd)

12. AT&T Prison Collect with Controls Service

AT&T Prison Collect with Controls Service is an AT&T Long Distance Service that permits inmates to place collect calls originated over the AT&T network from authorized telephone numbers in a Prison Administration controlled environment. Telephones subscribed for this service may be controlled by the Prison Administration for one or more of the following:

- duration of call
- call blocking
- time of day
- number of calls placed per individual
- permission restrictions
- restriction lists

Prison Collect with Controls Service is available at prisons in the state of Kentucky.

Prison Collect with Controls Service includes Operator Station Collect or Person-to-Person Collect calls placed to locations within the state of Kentucky. Prison Collect with Controls Service calls cannot be converted from a Collect call to a Calling Card call by the billed party.

Prison Collect with Controls Service includes usage charges and a Service Charge per call, as follows:

Operator Station Collect

Transport usage rate	
<u>InterLATA</u>	
Initial & Add'l Period	\$0.28
<u>IntraLATA</u>	
Initial & Add'l Period	\$0.23
Service Charge per call	\$1.50

PUBLIC SERVICE COMMISSION  
OF KENTUCKY  
EFFECTIVE

Person-to-Person Collect

Transport usage rate	
<u>InterLATA</u>	
Initial & Add'l Period	\$0.28
<u>IntraLATA</u>	
Initial & Add'l Period	\$0.23
Service Charge per call	\$1.50

DEC 15 2001

PURSUANT TO 807 KAR 5:011,  
SECTION 9 (1)

BY: Stephan D. Bell  
SECRETARY OF THE COMMISSION

**Inmate Rate Caps  
Louisiana**

**State:** Louisiana

**Local Institution Calling:** Service charge: \$ 0.63  
\$ 0.35 per five minute

**IntraLata Institution Calling:** Service charge: \$ 2.15

RATE MILEAGE	DAY		EVENING		NIGHT/WEEKEND	
	INITIAL PERIOD	EACH ADD'L PERIOD	INITIAL PERIOD	EACH ADD'L PERIOD	INITIAL PERIOD	EACH ADD'L PERIOD
0-10	0.1400	0.1400	0.1100	0.1100	0.0900	0.0900
11-16	0.2400	0.1900	0.1680	0.1330	0.1200	0.1000
17-22	0.2500	0.2400	0.1750	0.1680	0.1250	0.1200
23-30	0.2500	0.2500	0.1750	0.1750	0.1250	0.1250
31-40	0.2500	0.2500	0.1750	0.1750	0.1250	0.1250
41-55	0.2500	0.2500	0.1750	0.1750	0.1400	0.1400
56-70	0.2500	0.2500	0.1750	0.1750	0.1500	0.1500
71-100	0.2500	0.2500	0.1750	0.1750	0.1500	0.1500
101-124	0.2500	0.2500	0.1750	0.1750	0.1500	0.1500
125-196	0.2500	0.2500	0.1800	0.1800	0.1600	0.1600
197-292	0.2500	0.2500	0.1800	0.1800	0.1600	0.1600
293-99999	0.2500	0.2500	0.1900	0.1900	0.1700	0.1700

**InterLata Institution Calling:** Service charge: \$ 2.15

RATE MILEAGE	DAY		EVENING		NIGHT/WEEKEND	
	INITIAL PERIOD	EACH ADD'L PERIOD	INITIAL PERIOD	EACH ADD'L PERIOD	INITIAL PERIOD	EACH ADD'L PERIOD
0-10	0.1400	0.1400	0.1100	0.1100	0.0900	0.0900
11-16	0.1600	0.1600	0.1200	0.1200	0.1000	0.1000
17-22	0.1700	0.1700	0.1350	0.1350	0.1150	0.1160
23-30	0.1800	0.1800	0.1550	0.1550	0.1250	0.1250
31-40	0.1800	0.1800	0.1550	0.1550	0.1250	0.1250
41-55	0.2100	0.2100	0.1600	0.1600	0.1400	0.1400
56-70	0.2100	0.2100	0.1750	0.1750	0.1500	0.1500
71-100	0.2100	0.2100	0.1750	0.1750	0.1600	0.1600
101-124	0.2100	0.2100	0.1750	0.1750	0.1600	0.1600
125-196	0.2200	0.2200	0.1800	0.1800	0.1600	0.1600
197-292	0.2200	0.2200	0.1800	0.1800	0.1600	0.1600
293-99999	0.2300	0.2300	0.1900	0.1900	0.1700	0.1700

SOUTH CENTRAL BELL  
TELEPHONE COMPANY  
LOUISIANA  
ISSUED: October 25, 1995  
BY: President - Louisiana  
New Orleans, Louisiana

## GENERAL SUBSCRIBER SERVICES TARIFF

Fifth Revised Page 44  
Cancels Fourth Revised Page 44

EFFECTIVE: December 2, 1995

## A3. BASIC LOCAL EXCHANGE SERVICE

## A3.14 Operator Assisted Local Calls And Local Calling Card Service Calls

## A3.14.1 Operator Assistance Charges

A. *All types of local exchange service have local calling areas as specified in A3.6 of this Tariff which are areas that can be called on a flat rate basis (no charge for individual calls to the basic local calling area), on a local coin rate basis or on a Usage Based Pricing basis (charges based on a combination of one or more rating elements where Usage Based Pricing tariffs are in effect).*

## B. Local Dial Call

The call must be dialed and completed without the assistance of a Company operator and must be billed to the originating telephone when a charge is applicable.

C. *The following service charges for operator assisted local calls apply in addition to the local dial rate applicable.*

## 1. Billing Surcharges

	Nonrecurring Charge	USOC	
(a) Station-to-Station customer dialed calling card (credit card) calls, each	\$ .75	NA	C
X (b) Station-to-Station operator assisted sent-paid, collect, third number, and non-customer dialed credit card calls, each	1.83	NA	C
(c) Person-to-Person operator assisted calls, each	3.13	NA	C
X (d) Inmate calls from correctional institutions	.63	NA	
2. Operator Dialed Surcharge <sup>1</sup>			
(a) Station-to-Station operator assisted or Person-to-Person operator assisted calls (excluding those billed to calling cards) where the operator dials the terminating number, each	.80	NA	

## A3.14.2 Application Of Charges

A. The surcharge will be applied to each completed call except:

- For calls to the Company for official telephone business.
- For emergency calls to agency type telephone numbers such as to those agencies of the federal, state or local government which have the capability and legal authority to provide aid in emergency situations and to any emergency medical number.
- When the caller identified himself as being handicapped and unable to place the call due to his handicap.
- When the caller advises he has had service trouble in reaching the terminating number.

## A3.14.3 Reserved For Future Use

## A3.14.4 Operator Assisted Premium Plan

A. A premium is defined as a commission applicable to surcharge revenue associated with local operator assisted call requests sent to the Company by the customer. Such premiums may be payable to subscribing customers based on the Company's surcharge revenue generated by said calls. These calls must:

- originate from a telephone line associated with the customer's account,
- originate and terminate in the same Basic Local Calling Area,
- be carried and completed by the Company via Company facilities and

Note 1: An Operator Dialed Surcharge is in addition to any applicable Billing Surcharge. The Operator Dialed Surcharge will not apply to the Billing Surcharge for local operator assisted calls originating from inmates at correctional institutions.

Material previously appearing on this page now appears on page(s) 44.1 of this section

BELLSOUTH  
TELECOMMUNICATIONS, INC.  
LOUISIANA  
ISSUED: December 13, 2001  
BY: President - Louisiana  
New Orleans, Louisiana

## GENERAL SUBSCRIBER SERVICES TARIFF

Fourth Revised Page 8.1  
Cancels Third Revised Page 8.1  
EFFECTIVE: February 2, 2002

## A7. COIN TELEPHONE SERVICE

## A7.4 Access Line Service For Customer-Provided Public Telephones (Cont'd)

## A7.4.5 Rates And Charges (Cont'd)

## A. (Cont'd)

## 1. (Cont'd)

b. Access Line Feature Charges<sup>1</sup>

## (1) Public telephone access line

	Monthly Rate	USOC
(a) Unrestricted, outward, each	\$-	1ZB
(b) Unrestricted, two-way, each	-	1ZA
(c) Restricted, outward, each <sup>2,3</sup>	-	2D2
(d) Restricted, two-way, each <sup>2,3</sup>	-	1FZ
(e) Restricted, outward, each <sup>2,3,4</sup>	-	1Z3
(f) Restricted, two-way, each <sup>2,3,4</sup>	-	1Z5
(g) Restricted, outward, each <sup>2,3,5</sup>	-	13D
(h) Restricted, two-way, each <sup>2,3,5</sup>	-	13E

c. Local messages within the Expanded Local Calling Area will be charged as specified in A3.32 of this Tariff.

2. Service charges are applied on the same basis as for individual line business service covered in Section A4. of this Tariff.
3. At the request of the subscriber, Touch-Tone Calling Service may be provided as covered in Section A13. of this Tariff at no charge to the customer.
4. The subscriber is responsible for Directory Assistance service charges as covered in Sections A3. and A18. of this Tariff.
5. Trouble Determination charges are applied on the same basis as for Residence or Business Service covered in Section A4. of this Tariff.
6. Directory listings in connection with two-way public telephone access lines are furnished as covered in Section A6. of this Tariff. Listings are not available for outward public telephone access lines.
7. Non-sent paid local calls will be rated to the end user at the rate set forth in A7.4.5.B. plus the appropriate operator surcharge in Section A3. of this Tariff.
8. Non-sent paid calls into the Expanded Local Calling Area will be rated to the end user at the rate set forth in A3.32 plus the appropriate operator surcharge in Section A3. of this Tariff.

## B. Local End User Message Charges

1. Local messages placed within the basic local calling area from pay telephones are charged as follows:

	Rate	USOC	
(a) Each five minutes or fraction thereof	\$\$.30	NA	(1)
Note 1:	For the Access Line Feature options which do not offer central office blocking of 900 and 976 calls, this feature is available at the request of the subscriber as provided under Customized Code Restriction (CCR) Option #4 defined in A13.20 of this Tariff for business line customers.		
Note 2:	Provides operator screening.		
Note 3:	Provides central office blocking of 011+ calls direct distance dialed to numbers outside the North American Numbering Plan.		
Note 4:	1+900, 7 digit local, 1+ to the Expanded Local Calling Area, 1+DDD and 976 are blocked from completion.		
Note 5:	1+900, 1+DDD, 1+ to the Expanded Local Calling Area and 976 are blocked from completion.		

## SECTION VI - DESCRIPTION OF SERVICES, RATES AND CHARGES (Cont.)

## B. Rates and Charges (Cont.)

## 4. Measurement and Timing of Messages. (Cont.)

d. On Collect Calls and Person to Person calls, chargeable time begins when Customer at the Called Station accepts the charge by following instructions for accepting the call as provided by the operator or synthesized operator.

## C. Branding and Surcharges

1. Branding. The identity of the company providing operator service will be provided to customers placing Dial Calling Card, Station to Station, or Dial Collect calls, prior to completion of the call.

2. Surcharges. In addition to the charges set out in Section VI.B., the following surcharges apply:

## BILLING SERVICES: LOCAL, INTRALATA TOLL

Operator Services	IntraLATA Toll Per Call	Local Per Call	
Local Directory Assistance	N/A	\$0.50	(I)
Long Distance Directory Assistance	\$0.50	N/A	(R)
Operator Dialed Calling Card	\$2.15	\$1.83	
Operator Assisted			
Collect	\$2.15	\$1.83	
Inmate Collect	\$2.15	\$0.63	
Billed to Third Party	\$2.25	\$1.83	
Person-to-Person	\$4.50	\$3.13	
Operator-Dialed Surcharge	\$1.00	\$0.80	
<b>Unassisted Call Surcharges</b>			
Customer-Dialed Calling Card	\$0.80	\$0.75	
Customer-Dialed Coin Sent-Paid	\$1.95	N/A	

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*Issued by: James B. Hawkins*

*President-BellSouth Public Communications, Inc.*



## SECTION VI - DESCRIPTION OF SERVICES, RATES AND CHARGES (Cont.)

## B. Rates and Charges (Cont.)

## 2. Rates (Cont.)

## e. IntraLATA Long Distance.

Rate Table for Calling Card, Operated Assisted, Person-to-Person calls.

<u>Miles</u>	<u>Day</u>		<u>Eve.</u>		<u>Night/Weekend</u>	
	INITIAL MINUTE	EACH ADD'L MINUTE	INITIAL MINUTE	EACH ADD'L MINUTE	INITIAL MINUTE	EACH ADD'L MINUTE
0-10	\$.1300	\$.1200	\$.1000	\$.0900	\$.0800	\$.0800
11-16	.1300	.1300	.1000	.1000	.0800	.0800
17-22	.1400	.1400	.1100	.1100	.0900	.0900
23-40	.1600	.1600	.1200	.1200	.1000	.1000
41-55	.1700	.1700	.1400	.1400	.1200	.1200
56-124	.2000	.2000	.1600	.1600	.1400	.1400
125-292	.2100	.2100	.1700	.1700	.1500	.1500
293-430	.2200	.2200	.1800	.1800	.1600	.1600

Rate Table for Coin Sent-Paid Calls (Option A).

(T)

<u>Miles</u>	<u>Day</u>		<u>Eve.</u>		<u>Night/Weekend</u>	
	FIRST 3 MIN	EACH ADD'L MINUTE	FIRST 3 MIN	EACH ADD'L MINUTE	FIRST 3 MIN	EACH ADD'L MINUTE
0-10	\$.3700	\$.1200	\$.2800	\$.0900	\$.2400	\$.0800
11-16	.3900	.1300	.3000	.1000	.2400	.0800
17-22	.4200	.1400	.3300	.1100	.2700	.0900
23-40	.4800	.1600	.3600	.1200	.3000	.1000
41-55	.5100	.1700	.4200	.1400	.3600	.1200
56-124	.6000	.2000	.4800	.1600	.4200	.1400
125-292	.6300	.2100	.5100	.1700	.4500	.1500
293-430	.6600	.2200	.5400	.1800	.4800	.1600

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President-BellSouth Public Communications, Inc.

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.  
GENERAL SERVICES TARIFF  
LOUISIANA

TARIFF A  
SECTION A5

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BY: Leslie Buford-Tariff Administrator

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CANCELS ORIGINAL PAGE 4.1.1

A5. MESSAGE TELECOMMUNICATIONS SERVICE

A5.3 Two-Point Service (Cont'd)

A5.3.1 Service Between Telephones (Cont'd)

B. Rates and Charges (Cont'd)

8. Service Charges and Surcharges (Cont'd)

b. The following charges are in addition to the usage charges for intraLATA calls found in the preceding Rate Tables as indicated.

Class of Service	Billed To			
	AT&T CIID/891 Card	Local Exchange Co. Calling Card	Commercial Credit/ Charge Card	
For Card calls accessing AT&T's network other than via 1-800-CALLATT:				
- Customer Dialed Calling Card Station	\$0.80 I	\$0.80 R	\$1.50	
Customer Dialed/Automated	\$2.20 I	\$2.20 I	\$2.20 I	
Customer Dialed and Operator Assisted	\$0.80 I	\$0.80 R	\$1.50	
Customer Dialed-Operator Must Assist	\$2.20 I	\$2.20 I	\$2.20 I	
- Operator Dialed Calling Card Station	\$2.20 I	\$2.20 I	\$2.20 I	
For Card calls accessing AT&T's network via 1-800-CALLATT:				
- Customer Dialed Calling Card Station	\$0.80 I	\$0.80 I	\$1.50	N
Customer Dialed/Automated	\$2.20 I	\$2.20 I	\$2.20	
Customer Dialed and Operator Assisted	\$0.80 I	\$0.80 I	\$1.50	
Customer Dialed-Operator Must Assist	\$2.20 I	\$2.20 I	\$2.20	N
- Operator Dialed Calling Card Station	\$2.20 I	\$2.20 I	\$2.20	N

Class of Service	Billed to AT&T CIID/891 Card	All Other Calls
- Operator Station*		
Collect		\$2.15 I
Billed to Third Number		\$2.25 I
Sent Paid-Non Coin		\$2.25 I
Sent Paid-Coin		\$2.05 I
- Person-to-Person*	\$4.50 I	\$4.50 I

	Customer - Dialed Called Number	Operator- Dialed Called Number
- Operator Dialed Surcharge* Per call	\$1.00 I	\$1.00 I

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.

GENERAL SERVICES TARIFF

LOUISIANA

TARIFF A

SECTION A5

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BY: Leslie Buford-Tariff Administrator

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CANCELS FIRST REVISED PAGE 3.4.1

A5. MESSAGE TELECOMMUNICATIONS SERVICE

A5.3 Two-Point Service (Cont'd)

A5.3.1 Service Between Telephones (Cont'd)

B. Rates and Charges (Cont'd)

3. Operator Station (Cont'd)

a. IntraLATA Calls Billed to Third Party, Collect and Sent Paid Non-Coin Calls

RATE MILEAGE	DAY		EVENING		NIGHT/WEEKEND	
	INITIAL PERIOD	EACH ADD'L MINUTE	INITIAL PERIOD	EACH ADD'L MINUTE	INITIAL PERIOD	EACH ADD'L MINUTE
1 - 10	\$ .1400	\$ .1400	\$ .1400 I	\$ .1400 I	\$ .1400 I	\$ .1400 I
11 - 16	0.2400 I	0.1900 I	0.2400 I	0.1900 I	0.2400 I	0.1900 I
17 - 22	0.2500 I	0.2400 I	0.2500 I	0.2400 I	0.2500 I	0.2400 I
23 - 40	0.2500	0.2500	0.2500	0.2500	0.2500	0.2500
41 - 55	0.2500	0.2500	0.2500	0.2500	0.2500	0.2500
56 - 124	0.2500	0.2500	0.2500	0.2500	0.2500	0.2500
125 - 292	0.2500	0.2500	0.2500	0.2500	0.2500	0.2500
293 - 430	0.2500 I	0.2500 I	0.2500 I	0.2500 I	0.2500 I	0.2500 I

b. IntraLATA Sent Paid Coin Calls

RATE MILEAGE	DAY		EVENING		NIGHT/WEEKEND	
	INITIAL PERIOD	EACH ADD'L MINUTE	INITIAL PERIOD	EACH ADD'L MINUTE	INITIAL PERIOD	EACH ADD'L MINUTE
1 - 10	\$ .1400 R	\$ .1400 R	\$ .1400 R	\$ .1400 R	\$ .1400 R	\$ .1400 R
11 - 16	0.2400 I	0.1900 R	0.2400 I	0.1900 R	0.2400 I	0.1900 R
17 - 22	0.2500 I	0.2400 I	0.2500 I	0.2400 I	0.2500 I	0.2400 I
23 - 40	0.2500	0.2500	0.2500	0.2500	0.2500	0.2500
41 - 55	0.2500	0.2500	0.2500	0.2500	0.2500	0.2500
56 - 124	0.2500	0.2500	0.2500	0.2500	0.2500	0.2500
125 - 292	0.2500	0.2500	0.2500	0.2500	0.2500	0.2500
293 - 430	0.2500 I	0.2500 I	0.2500 I	0.2500 I	0.2500 I	0.2500 I

AT&T COMMUNICATIONS OF THE SOUTH CENTRAL STATES, INC.  
GENERAL SERVICES TARIFF  
LOUISIANA

TARIFF A  
SECTION A5

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BY: Leslie Buford-Tariff Administrator

FIFTEENTH REVISED PAGE 3.4

CANCELS FOURTEENTH REVISED PAGE 3.4

A5. MESSAGE TELECOMMUNICATIONS SERVICE

A5.3 Two-Point Service (Cont'd)

A5.3.1 Service Between Telephones (Cont'd)

B. Rates and Charges (Cont'd)

3. Operator Station

a. InterLATA Calls Billed to Third Party, Collect and Sent Paid  
Non-Coin Calls

RATE MILEAGE	DAY		EVENING		NIGHT/WEEKEND	
	INITIAL PERIOD	EACH ADD'L MINUTE	INITIAL PERIOD	EACH ADD'L MINUTE	INITIAL PERIOD	EACH ADD'L MINUTE
1 - 10	\$.1400 R	\$.1400 R	\$.1400 R	\$.1400 R	\$.1400 R	\$.1400 R
11 - 16	0.2400 I	0.1900 R	0.2400 I	0.1900 R	0.2400 I	0.1900 R
17 - 22	0.2500 I	0.2400 I	0.2500 I	0.2400 I	0.2500 I	0.2400 I
23 - 40	0.2500	0.2500	0.2500	0.2500	0.2500	0.2500
41 - 55	0.2500	0.2500	0.2500	0.2500	0.2500	0.2500
56 - 124	0.2500	0.2500	0.2500	0.2500	0.2500	0.2500
125 - 292	0.2500 I	0.2500 I	0.2500 I	0.2500 I	0.2500 I	0.2500 I
293 - 430	0.2500 I	0.2500 I	0.2500 I	0.2500 I	0.2500 I	0.2500 I

b. InterLATA Sent Paid Coin Calls

RATE MILEAGE	DAY		EVENING		NIGHT/WEEKEND	
	INITIAL PERIOD	EACH ADD'L MINUTE	INITIAL PERIOD	EACH ADD'L MINUTE	INITIAL PERIOD	EACH ADD'L MINUTE
1 - 10	\$.1400 R	\$.1400 R	\$.1400 R	\$.1400 R	\$.1400 R	\$.1400 R
11 - 16	0.2400 I	0.1900 R	0.2400 I	0.1900 R	0.2400 I	0.1900 R
17 - 22	0.2500 I	0.2400 I	0.2500 I	0.2400 I	0.2500 I	0.2400 I
23 - 40	0.2500	0.2500	0.2500	0.2500	0.2500	0.2500
41 - 55	0.2500	0.2500	0.2500	0.2500	0.2500	0.2500
56 - 124	0.2500	0.2500	0.2500	0.2500	0.2500	0.2500
125 - 292	0.2500 I	0.2500 I	0.2500 I	0.2500 I	0.2500 I	0.2500 I
293 - 430	0.2500 I	0.2500 I	0.2500 I	0.2500 I	0.2500 I	0.2500 I

Inmate Rate Caps  
Maryland

**State:** Maryland

**Local:** Bell Atlantic

**IntraLata:** Bell Atlantic

**InterLata:** AT&T

## MESSAGE TELECOMMUNICATIONS SERVICES TARIFF

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## TWO-POINT SERVICE

## 2.3. RATES (Cont'd)

## 2.3.3. Rate Schedules (Cont'd)

## D. Operator Station

## 2. IntraLATA

## a. Billed to Third Party, Collect and Sent Paid Non-Coin Calls

RATE AIRLINE MILEAGE	DAY		EVENING		NIGHT/WEEKEND	
	Initial Period	Each Add'l Period	Initial Period	Each Add'l Period	Initial Period	Each Add'l Period
1 - 10	\$ .3000(I)	\$ .3000(I)	\$ .3000(I)	\$ .3000(I)	\$ .3000(I)	\$ .3000(I)
11 - 22	.3000	.3000	.3000	.3000	.3000	.3000
23 - 55	.3000	.3000	.3000	.3000	.3000	.3000
56 - 124	.3000	.3000	.3000	.3000	.3000	.3000
125 - 292	.3000(I)	.3000(I)	.3000(I)	.3000(I)	.3000(I)	.3000(I)

## b. Sent Paid-Coin Calls

RATE AIRLINE MILEAGE	DAY		EVENING		NIGHT/WEEKEND	
	Initial Period	Each Add'l Period	Initial Period	Each Add'l Period	Initial Period	Each Add'l Period
1 - 10	\$ .9000(I)	\$ .9000(I)	\$ .9000(I)	\$ .9000(I)	\$ .9000(I)	\$ .9000(I)
11 - 22	.9000	.9000	.9000	.9000	.9000	.9000
23 - 55	.9000	.9000	.9000	.9000	.9000	.9000
56 - 124	.9000	.9000	.9000	.9000	.9000	.9000
125 - 292	.9000(I)	.9000(I)	.9000(I)	.9000(I)	.9000(I)	.9000(I)

MESSAGE TELECOMMUNICATIONS SERVICES TARIFF

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TWO-POINT SERVICE

2.3. RATES (Cont'd)

2.3.3. Rate Schedules (Cont'd)

D. Operator Station

1. InterLATA

a. Billed to Third Party, Collect and Sent Paid Non-Coin Calls

RATE AIRLINE MILEAGE	DAY		EVENING		NIGHT/WEEKEND	
	Initial Period	Each Add'l Period	Initial Period	Each Add'l Period	Initial Period	Each Add'l Period
1 - 10	\$ .4500(I)	\$ .4500(I)	\$ .4500(I)	\$ .4500(I)	\$ .4500(I)	\$ .4500(I)
11 - 22	.4500	.4500	.4500	.4500	.4500	.4500
23 - 55	.4500	.4500	.4500	.4500	.4500	.4500
56 - 124	.4500	.4500	.4500	.4500	.4500	.4500
125 - 292	.4500(I)	.4500(I)	.4500(I)	.4500(I)	.4500(I)	.4500(I)

b. Sent Paid-Coin Calls

RATE AIRLINE MILEAGE	DAY		EVENING		NIGHT/WEEKEND	
	Initial Period	Each Add'l Period	Initial Period	Each Add'l Period	Initial Period	Each Add'l Period
1 - 10	\$1.800(I)	\$1.800(I)	\$1.800(I)	\$1.800(I)	\$1.800(I)	\$1.800(I)
11 - 22	1.800	1.800	1.800	1.800	1.800	1.800
23 - 55	1.800	1.800	1.800	1.800	1.800	1.800
56 - 124	1.800	1.800	1.800	1.800	1.800	1.800
125 - 292	1.800(I)	1.800(I)	1.800(I)	1.800(I)	1.800(I)	1.800(I)

Bell Atlantic - Maryland, Inc.

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OPERATOR SERVICES TWO-POINT SERVICE

C. RATES

1. Application of Rates

Rates for service between points are based on the airline mileage between rate centers. Airline mileage between rate centers is determined as specified in Section 4 of this Tariff. Rates applicable for the mileages obtained are as specified in 2. following, except as follows.

(T)

2. Current Effective Rate Schedule

a. Customer-Dialed Direct Station-to-station

RATE AIRLINE MILES	DAY		EVENING		NIGHT AND WEEKEND	
	Initial Period 1 Min.	Add'l Period Each 1 Min.	Initial Period 1 Min.	Add'l Period Each 1 Min.	Initial Period 1 Min.	Add'l Period Each 1 Min.
1 - 10	\$.21	\$.10	\$.15	\$.07	\$.10	\$.06
11 - 16	.22	.15	.18	.09	.12	.07
17 - 22	.25	.17	.20	.10	.13	.08
23 - 30	.27	.21	.24	.14	.16	.09
31 - 40	.28	.22	.25	.17	.18	.11
41 - 55	.29	.23	.26	.19	.19	.12
56 - 70	.30	.24	.27	.20	.20	.13
71 - 124	.31	.25	.28	.21	.21	.14

b. Operator-Assisted Call Charges

	Charge Per Call	
(1) Station-to-station Customer-Dialed Calling Card* .....	\$.60	
(2) Station-to-station Operator-Assisted, other than (1) preceding .....	2.00	(I)
(3) Station-to-station Machine-Handled, other than (1) preceding .....	2.00	(I)
(4) Station-to-station Live Operator-Handled .....	2.25	(I)
(5) Person-to-person .....	3.00	

\* Toll calls originating from pay phones made through a Telecommunications Relay Service (TRS) will not exceed the rate applicable for a similar non-TRS toll call made using coin sent-paid service.



Inmate Rate Caps  
West Virginia

**State:** West Virginia

Rates above Bell and AT&T will not be approved with a hearing

LONG DISTANCE SERVICES TARIFF  
P.S.C.-W.Va.-No. 209

Verizon West Virginia Inc.

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OPERATOR SERVICES TWO-POINT SERVICE

C. RATES (Cont'd)

3. Special Service Charges (Cont'd)

a. Station-to-station (Cont'd)

(2) (Cont'd)

(a) An operator-completed call is a call which the customer dials as zero, and the operator dials the called number, obtains the billing information and/or completes the call. This call is referred to as zero minus (0-) indicating that the caller needs to dial 0. An operator-assisted charge applies.

(b) An operator-serviced call is a call which the customer dials as zero, plus the called number, and requires the assistance of the operator for billing and completion. This call is referred to as zero plus (0+) indicating that the caller needs to dial 0, followed by the called number. An operator-assisted charge applies.

	Charge Per Call
Operator-Completed (0-) (Operator dials the number)	

Coin or Noncoin .....	Rate Deregulated
-----------------------	---------------------

Operator-Serviced (0+)  
(Customer dials the number)

Corrections Collect Call.....	Rate Deregulated	(T)
-------------------------------	---------------------	-----

Bill-to-third Party - Coin or Collect.....	Rate Deregulated
--	---------------------

Bill-to-third Party - Noncoin or Sent-paid Noncoin....	Rate Deregulated
--	---------------------

Automated Calling Card*†.....	Rate Deregulated
-------------------------------	---------------------

Sent-paid Coin.....	Rate Deregulated
---------------------	---------------------

b. Person-to-person.....	Rate Deregulated
--------------------------	---------------------

\* The Operator-Serviced (0+) Sent-Paid Noncoin charge applies to operator-completed calling card calls except for customers placing calls through a Telecommunications Relay Service Center.

† Toll calls originating from pay phones made through a Telecommunications Relay Service (TRS) will not exceed the rate applicable for a similar non-TRS toll call made using coin sent-paid service.

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GENERAL SERVICES TARIFF  
P.S.C.-W.Va.-No. 203

Bell Atlantic - West Virginia, Inc.

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OPERATOR ASSISTED LOCAL CALLS-

C. RATES (Cont'd)

2. Rate Schedule (Cont'd)

a. Station-to-station (Cont'd)

(2) Operator Assisted (Cont'd)

	Charge Per Call	
Operator Serviced (0+) (Customer dials the number)		(
✕ Coin or Collect. . . . .	\$2.00	(
All Others . . . . .	1.55	
★ Calling Card* or Inmate. . . . .	.60	(
b. Person-to-person . . . . .	4.00	
c. Directory Assistance Service		
Operator Serviced Calling Card . . . . .	.60	
All Other Calls . . . . .	1.55	

\* The Operator Serviced Calling Card charge applies to operator completed calling card calls where operator serviced calls are not available.

Issued by authority of an Order of the Public Service Commission of West Virginia  
in Case No. \_\_\_\_\_ dated \_\_\_\_\_.

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LONG DISTANCE SERVICES TARIFF  
P.S.C.-W.Va.-No. 209

Bell Atlantic - West Virginia, Inc.

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Cancels 2nd Revised Page 4a

OPERATOR SERVICES TWO-POINT SERVICE

(C)

C. RATES (Cont'd)

2. Rate Schedule for Customer-dialed Station-to-station Two-point Service

RATE AIR LINE MILES	RATES					
	CUSTOMER-DIALED DIRECT					
	STATION-TO-STATION					
	DAY		EVENING		NIGHT AND WEEKEND	
	Initial Period	Add'l Period Each	Initial Period	Add'l Period Each	Initial Period	Add'l Period Each
	1 Min.	1 Min.	1 Min.	1 Min.	1 Min.	1 Min.
1 - 10	\$.260	\$.130	\$.156	\$.078	\$.104	\$.052
11 - 22	.360	.230	.216	.138	.144	.092
23 - 55	.620	.410	.372	.246	.248	.164
56 - 124	.700	.450	.420	.270	.280	.180
125 - 292	.710	.470	.426	.282	.284	.188

3. Special Service Charges

a. Station-to-station

(1) Customer-dialed

Charge Per  
Call

Automated Calling Card Service\* . . . . . \$ .60

Automated Coin Telephone Service . . . . . .60

(2) Operator-Assisted

Operator-assisted service requires the services of a Telephone Company operator in the completion of station-to-station calls or requests for any information or assistance relating to billing or charges for such calls, except as specified preceding for customer-dialed calls.

An operator-assisted call may be either operator completed or operator serviced.

\* Toll calls originating from pay phones made through a Telecommunications Relay Service (TRS) will not exceed the rate applicable for a similar non-TRS toll call made using coin sent-paid service.

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## MESSAGE TELECOMMUNICATIONS SERVICES TARIFF

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of West Virginia

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## TWO-POINT SERVICE

## 2.3. PRICES (Cont'd)

## 2.3.3. Price Schedules (Cont'd)

## H. Service Charges and Surcharges

	Price Per Call Billed To	
	AT&T CIID/891 Card	All Other Cards
1. Customer Dialed Calling Card Station		
Customer Dialed/Automated	\$ .59	\$ .80
Customer Dialed Operator Assisted	\$ .59	\$ .80
Customer Dialed and Operator Must Assist	\$ .59	\$ .80
2. Operator Dialed Calling Card Station	\$1.99	\$2.15
	AT&T CIID/891 Card	All Other Calls
3. Operator Dialed Surcharge		
(Operator Dialed Called Number)		\$1.00
(Customer Dialed Called Number)		\$ .85
4. Operator Station		
Collect	-	\$2.15
Billed to Third Party	-	\$2.25
Sent Paid - Non Coin	-	\$2.20
Sent Paid - Coin	-	\$1.85
5. Person-to-Person	\$4.00	\$4.00
		<u>Price Per Call</u>
6. Operator Transfer Service Charge		\$ .55

(N)  
|  
(N)Issued by Authority of an Order by the Public Service Commission of West  
Virginia in Case Number 97-1515-T-T dated November 21, 1997.

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MESSAGE TELECOMMUNICATIONS SERVICES TARIFF  
P.S.C.-W.Va.-No. 4

AT&T Communications  
of West Virginia

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TWO-POINT SERVICE

2.3. PRICES (Cont'd)

2.3.3. Price Schedules (Cont'd)

D. Operator Station

1. Billed to Third Party, Collect and Sent Paid Non-Coin Calls

RATE AIRLINE MILES	DAY		EVENING		NIGHT/WEEKEND	
	Initial Period	Each Add'l Period	Initial Period	Each Add'l Period	Initial Period	Each Add'l Period
1 - 10	\$.2400 (R)	\$.1800 (I)	\$.1600 (R)	\$.1600 (I)	\$.1300 (R)	\$.1200 (I)
11 - 22	.3000	.2500	.2100	.1700	.1400	.1400
23 - 55	.3600	.3200	.2500	.2300	.1800	.1600
56 - 124	.4000	.3700	.2900	.2600	.2100	.1800
125 - 292	.4300 (R)	.4100 (I)	.3200 (R)	.3000 (I)	.2300 (R)	.2300 (I)

2. Sent Paid-Coin Calls

RATE AIRLINE MILES	DAY		EVENING		NIGHT/WEEKEND	
	Initial Period	Each Add'l Period	Initial Period	Each Add'l Period	Initial Period	Each Add'l Period
1 - 10	\$.6000 (I)	\$.4500 (I)	\$.4800 (I)	\$.4000 (I)	\$.3700 (I)	\$.3000 (I)
11 - 22	.8000	.6250	.5500	.4250	.4200	.3500
23 - 55	1.000	.8000	.7100	.5750	.5000 (I)	.4000
56 - 124	1.140	.9250	.8100	.6500	.5700	.4500
125 - 292	1.250 (I)	1.025 (I)	.9200 (I)	.7500 (I)	.6900 (I)	.5750 (I)

Issued by Authority of an Order by the Public Service Commission of West Virginia in Case Number 95-0840-T-T dated September 15, 1995.

Issued: September 5, 1995

Effective: September 19, 1995

# **ATTACHMENT 4**

## **Evaluation of Proposed Alternative Approaches to the Provision of Inmate Telephone Services**

# **EVALUATION OF PROPOSED ALTERNATIVE APPROACHES TO THE PROVISION OF INMATE TELEPHONE SERVICE**

**Prepared By The Inmate Calling Service Providers Task Force**

**July 2000**

Recently, a number of proposals have been made for alternative approaches to the provision of telephone service to inmates of confinement facilities. For example, it has been suggested that, in order to limit billing and collection expenses and unbillables/uncollectables, a facility could offer a prepaid, or debit-based, calling service rather than the collect calling service traditionally offered. It has also been suggested that facilities could offer inmates a choice of carriers, creating a cost reduction incentive as carriers compete for inmates' business. This paper analyzes and evaluates these alternatives.

The Coalition supports the provision of service on a prepaid, or debit, basis as an option where feasible and cost-effective. Such an approach can result in lower call rates in prison facilities where the duration of stay is long enough to make a debit program cost-effective. A simplified debit program using pre-paid cards may sometimes be an option in large jail facilities where staff is available to administer the program. However, at this time debit programs are generally not feasible for small and medium-sized jail facilities.

Offering inmates carrier choice, on the other hand, is generally not feasible for either prisons or jails, due to the numerous intractable security and fraud problems that would result. In the Coalition's view, rates can be effectively limited through other means, such as cost-based rate regulation or rate-based evaluation of competitive bids, which do not threaten the fundamental security needs of the facility.

## **Debit Systems**

As an approach to reducing the costs of inmate telephone service, some confinement facilities have explored the use of a debit system. Such systems can achieve cost savings under some circumstances in large prison facilities, where the duration of confinement is relatively long. However, such systems are of only limited usefulness for jail facilities, where the duration of confinement is relatively short.

**Typical Operation of a Debit Program.** First, the inmate is assigned a personal identification number ("PIN"). Then, an account established and funded (either by the inmate or a family member) and associated with the PIN. The account may be part of an existing trust-account or commissary program or may be established on a stand-alone basis. The inmate submits a list of names, addresses and phone numbers of parties the inmate wishes to call. That information is verified, and each telephone number is called by the



program administrator to ensure that the party subscribing to that number is willing to receive the inmate's calls.

Debit systems are attractive from a billing perspective because calls are completed with the certainty of payment. Thus, there are virtually no uncollectables or bad debt. Also, since calls are not billed through local exchange carriers or clearinghouses, there is no post-payment billing and collection expense. Ongoing LIDB validation costs may also be largely avoided.

On the other hand, there are significant costs involved in the additional equipment and personnel required to administer debit calling programs. To have a comprehensive debit calling program, it is necessary for facility personnel to be assigned to the administration of the program. In light of the major up-front costs involved in setting up the program and in establishing individual user accounts, debit programs are more cost effective in large facilities where there are economies of scale and in long-duration (i.e. prison) facilities where there is less "churn" in the inmate population. The rate of a debit call must cover the costs associated with setting up new accounts with personal identification numbers ("PINs"), verifying pre-approved calling lists, processing inmate funds associated with the debit account and making ongoing changes to pre-approved calling lists. In addition, all of the costs of maintaining security measures would have to be covered in the cost of a debit call.

There are other concerns. With inmate debit programs, a "commodity" is created. Debit programs are dependent on the creation of a PIN or account number that is exclusive to each inmate or account. This number has an inherent value in that the number is worth a certain number of phone calls. This number becomes a commodity that can and has become a source of disruption in the inmate environment. The PIN or account number in effect can become "contraband" that can be traded among, stolen from, and taken by force from inmates.

**Successful Use of A Debit Program.** The Federal Bureau of Prisons has been at least partially successful in implementing a debit program. The Bureau has been willing to employ a large in-house staff and create an entire Inmate Telephone Systems Department. This department employs several dozen administrators, and is projected to employ several hundred administrators once the system is fully implemented at all federal prisons.

**Disadvantages of Debit Programs in the Jail Environment.** For facilities with fewer administrative resources – such as county jails – a debit system is not likely to be practical. Most such facilities have very limited budgets and administrative staff. Most lack the capability to add the resources necessary to administer a debit program. The administrative costs for jails are compounded because debit programs are normally administered most efficiently in conjunction with a facility's commissary and/or trust account program, as this is where an inmate's funds are normally held. Under this approach, funds held for an inmate would be available to place debit calls. Most county jail

facilities do not currently have trust or commissary programs capable of interfacing with inmate phones. It would be impractical to require these facilities to acquire, implement, and staff debit programs.

An additional obstacle to implementing debit programs at the city or county jail level has to do with the average duration of confinement. The average stay of an inmate in a jail facility is less than thirty days, compared to months or years in state and Federal prisons. A substantial investment of time and money is required to assign PINs to an inmate, create an approved calling list and maintain an inmate's account. Given the relatively high per-inmate costs involved, the administrative costs are higher for jail facilities due to the much shorter average duration of confinement. Today the overwhelming majority of county jails do not assign PINs to inmates for the purpose of placing phone calls.

### **Alternative Debit Programs in the Jail Environment.**

Because of the problems identified above, simplified debit programs using pre-paid cards may be an option in jails where officers are available to sell the cards. It is critical for security purposes that pre-paid cards be restricted to cards provided by the inmate phone service provider. The pre-paid calling card must interface with the existing inmate phone service equipment to guarantee security features, call controls, etc... are not circumvented.

**Transitional Issues.** In those areas where debit programs are feasible, successful implementation cannot always occur quickly. A great deal of the call processing equipment used by providers today would require either expensive upgrades or replacement in order to be capable of implementing a debit program. A debit calling system inherently requires an "administration terminal" to be placed on-site for facility staff to enter debit account information. Facilities normally want the inmate phone system to be "transparent" to daily operations. The addition of the required administration terminal and related duties can present a challenge to the facility. This additional equipment must be capable of rating calls on-site, providing inmate balances in a "real-time" manner, and cutting off calls once the debit balance is exhausted. As a practical matter, to implement inmate debit calling on a wide scale may require several years and hundreds of millions of dollars in new equipment and staffing.

In addition to upgrading call processing equipment, it is also necessary to ensure compatibility with a facility's commissary or trust account system. As mentioned above, implementation of a debit system would require these facilities to purchase and implement a system dedicated to telephone service. There are a large variety of commissary and trust accounting systems available today. This presents a challenge to inmate phone service providers, in that a different "interface" must be designed for each different system. It is an

economic and practical impossibility for a provider to be able to interface with all systems. In addition, some larger facilities have accounting systems that were written “in-house”. Writing computer programs to interface with these systems can be difficult at best.

Despite these obstacles, new Requests for Proposals (“RFPs”) issued by many state governments reflect an increasing awareness by facility administrators of the value of debit systems in reducing the rates for inmate calls in state prisons. The market appears to be transitioning over time toward systems with debit calling options for state prisons.

### **Alternative Carriers**

The discussion above focuses on use of a debit system administered by a facility’s designated inmate calling service provider as a means of addressing billing costs and improving overall efficiency. Quite different issues are presented by proposals to introduce a choice of carriers into the inmate facility. The Coalition has not identified any cost-effective means to provide a choice of carriers to inmates without creating serious threats to a facility’s security.

Four possible approaches to “carrier choice” have been suggested: (1) allowing inmates to use commercial calling card and collect calling platforms (800-COLLECT, 800-CALL-ATT) and pre-paid calling cards, and (2) allowing inmates to direct-dial their calls, and (3) allowing inmates to place calls to “personal” 800 numbers that are billed to the called party. (4) Allow two competitive inmate calling service providers to provide service at the same time. While these alternatives may seem viable and simple on the surface, there are fundamental problems posed in the areas of security and practicality for the inmate facility.

**Commercial collect and pre-paid platforms.** Commercial service platforms include such recognizable products as (800) COLLECT and (800) CALL-ATT and pre-paid calling cards. This type of calling would pose great security challenges to inmate facilities.

The nature of these types of alternate carrier calling requires the caller to first dial a carrier or pre-paid card provider’s access number (such as 800-COLLECT). Then in the case of the alternative collect products, the caller is then prompted to enter in the number that they wish to call, normally with the option of placing the call as collect, calling-card, or third-party-billed. In the case of pre-paid cards, the caller would call the 800 number for the provider, enter in the PIN number printed on the card, then enter the number they wish to dial. These options would result in security challenges in that the inmate calling system has no control over the number that the inmate is calling. Since the inmate must dial the access number and then enter the calling number into the external carrier’s network, the inmate telephone system is incapable of screening the called number through

the blocked number database. The blocked number database contains numbers that include the administrative telephone numbers of the facility, the home numbers of staff, judges, witnesses, etc. as well as numbers that have been requested to be blocked by their owners due to harassment by inmates. If inmates are allowed what amounts to open access to the public network, all security measures will be circumvented. Also, all of the alternative collect access products allow access to a live operator, which also opens up an even greater opportunity for “social engineering” resulting in harassment and fraud.

In addition, for commercial collect calling services the potential for fraud is tremendous. Since the inmate phone system would be incapable of tracking and screening the number called (for the reasons stated above), the facility would not be able to place limitations on the number of calls placed to a particular number. Also, many inmate calling service providers and facilities produce reports that track calls from multiple cells to the same number. This type of activity is often indicative of criminal or fraudulent activity. The potential for fraudulent activity would also be greatly increased because calls placed on alternative carriers would not be “branded” as being from a correctional facility. Inmates will often place calls to random numbers, and the only way for a called party to know that a call is from a correctional facility is the notice on the accept message stating that the call is from such a facility.

### **Direct Dial Calling**

Direct-dial calling for inmates would involve the inmate placing calls without the involvement of an automated operator, with the call being dialed directly onto the public network. Since long-distance (and probably local usage) charges may be incurred by the provider for the carriage of such calls, there would need to be a form of billing involved for the inmate. This would require that the provider install a “debit system”, which requires sophisticated on-premise computer equipment that will allow the tracking and billing of these calls. As discussed in the first part of this paper, such a debit system requires a great deal of maintenance from facility staff, since inmate accounts are set up and maintained individually. All of the expenses involved in a debit system, as well as the costs of security measures and fraud prevention, would have to be included in the price of any direct dial call. Direct dial calling would only be practical with a debit system.

### **Personal 800 Numbers**

The personal 800 number option would involve friends and family of inmates setting up individual toll-free numbers to their homes for use by an inmate. The carrier of the 800 number would bill the family member or friend for calls. Implementation and management of this calling alternative would be difficult and costly, if not impossible in a jail environment.

Personal 800 number calling (as well as other types of calling) would require the use of “allowed-call lists” with PINs (Personal Identification Numbers). Since the issue of security is paramount at all inmate facilities, all 800 numbers (and all other “toll-free” exchanges) are normally “blocked” by an inmate telephone system. Toll-free numbers are almost always associated with a business, and businesses normally do not want calls from inmates, especially when they are being billed for the toll-free number usage. This fact would require that the inmate telephone system block all toll-free exchanges by default. Then, individual “personal” toll-free numbers would need to be entered into the inmate’s allowed-call list under their PIN number as an exception.

The costs to set up and maintain a personal 800 number system would have to be charged back to the inmate or the called party in some way. All the costs to maintain the security measures would also have to be billed to the inmate or called party. At this time the industry does not have a feasible way to bill these charges back to the inmate unless there is an existing debit system.

Personal 800 numbers are generally not feasible for jails because of the short average inmate stay that is inherent in the nature of the jail environment. The majority of the inmate population in a County Jail is being held awaiting arraignment and/or a bail hearing. This results in an average stay of less than 30 days. These facts are in direct contrast to the situation in state and Federal prisons, where the average stay is measured in years, not hours or days.

Most county jail facilities do NOT utilize allowed-call lists and PINs. With such a system, the facility staff must enter inmate information upon booking, including the creation and assignment of the PIN number, and the listing, verification and entering of the allowed-call list numbers. This process would be extremely time-consuming to the already undermanned jail facility staff. The implementation of such a system would most likely require that the facility hire additional staff.

### **Competing Inmate Calling Service Providers.**

On the surface, the option of having two different inmate calling service providers would appear to provide the inmates and their families the advantage of a choice of carriers that hopefully would compete for business by lowering the price of calls. This option presents several challenges for the facility and the inmate calling service providers. First, inmate calling service providers currently compete based on the service features they have incorporated in their equipment. Competition has motivated providers to invest hundreds of thousands of dollars in research and development to manufacture more and more sophisticated equipment with enhanced features. Assuming providers would bid for business based on an investment to provide service to the entire facility with a prospect of only getting half of the business, the cost of equipment would be doubled on every call. Second, the necessary sharing of information between providers, in as close to real time as

possible, would create an administrative nightmare. Regrettably, a portion of all inmate populations work every day to defeat the security features and fraud controls. The problem is hard enough to contain when one provider is looking at all the facts and has control of all the calls. If a facility moved to a two-carrier environment maintaining these security and fraud controls would become impractical if not impossible.

It might be argued that these difficulties would be overcome if the facility procured one set of equipment and required both carriers to utilize the same equipment. However, most major carriers today utilize different equipment and it would be highly unlikely that any provider would choose to bid on providing service unless they could use equipment which they were certified to use and with which they had extensive experience. All internal systems, software, and operation center support are designed to work with the provider's chosen equipment. For this reason alone no carrier would be willing to expose their company to uncontrollable fraud because of an inability to interface their operations center support with unfamiliar equipment.

Another serious difficulty with a dual-carrier approach is that each provider would be vulnerable to significant losses based on the action or inaction of the other carrier. For example, suppose Carrier One has excellent fraud control measures including early detection, billing, and management of Code 50 Rejects. Because of its superior program, Carrier One is able to discount calls to inmate families by 25%. Carrier Two does not have adequate early detection of Code 50 Rejects. The inmates advise their friends and family members to subscribe to local service through CLEC resellers. Although the calls with Carrier Two are higher priced, the inmates choose to use Carrier Two because it allows calls to CLECs. Because Carrier Two cannot bill these calls, the inmates' friends and families get "free" calls for a month or two before they are detected. The inmates' friends and families then change their numbers or move to another CLEC. Both inmate calling service providers lose. Carrier One loses because it made a significant investment in equipment and resources to provide quality service at a fair discounted price, yet its call revenue is significantly suppressed because a high percentage of inmates chose Carrier Two. Carrier Two loses because it has not yet developed internal controls for early detection, billing and management of Code 50 Reject calls.